

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARTINE THOMAS individually and as Parent and
Natural Guardian of A.T *et al.*,

Plaintiffs

-against-

DAVID C. BANKS, in his official capacity as Chancellor
of the New York City Department of Education, and THE
NEW YORK CITY DEPARTMENT OF EDUCATION

Defendants.

24-cv-5138-JLR

**DECLARATION OF
JAIMINI VYAS IN
SUPPORT OF DEFENDANTS'
MOTION TO PARTIALLY
DISMISS THE SECOND
AMENDED COMPLAINT
AND IN OPPOSITION TO
PLAINTIFFS' THIRD
MOTION FOR A
PRELIMINARY
INJUNCTION**

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Jaimini Vyas, an attorney duly admitted to practice law in the State of New York and before this Court, declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following statements are true and correct:

1. The undersigned is an Assistant Corporation Counsel within the General Litigation Division of the New York City Law Department representing Defendants David C. Banks and the New York City Department of Education (collectively, "Defendants") in this matter, and is fully familiar with the facts asserted herein.

2. This Declaration is submitted in support of Defendants' Motion to Partially Dismiss the Second Amended Complaint and in Opposition to Plaintiffs' Third emergency Motion for a Preliminary Injunction.

3. Attached hereto as Exhibit A is a redacted copy of the August 28, 2024 Order on Pendency issued in Case No. 277096 for A.C.

4. Attached hereto as Exhibit B is a redacted copy of the October 9, 2024, FOFD issued in Case No. 277155 for L.C.

5. Attached hereto as Exhibit C is a redacted copy of the September 15, 2024, Order on Pendency issued in Case No. 277178 for M.C.

6. Attached hereto as Exhibit D is a redacted copy of the October 11, 2024, FOFD issued in Case No. 277178 for M.C.

7. Attached hereto as Exhibit E is a redacted copy of the October 16, 2024, Notice of Intention to Seek Review by the State Review Office of the FOFD issued in Case No. 277178 for M.C.

8. Attached hereto as Exhibit F is a redacted copy of the October 14, 2024, FOFD issued in Case No. 277132 for M.B.

9. Attached hereto as Exhibit G is a redacted copy of the August 12, 2024 Order on Pendency issued in Case No. 277140 for S.J.D.

Dated: November 4, 2024
New York, New York

MURIEL GOODE-TRUFANT

Acting Corporation Counsel of the City of New York

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Jaimini A. Vyas

Assistant Corporation Counsel